



THE LAW OFFICES OF
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October 16, 2020

VIA E-FILING

Hon. Leda D. Wettre, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King, Jr. Building & US Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Etheridge v. EF Corporation, et al
Docket No. 2:19-cv-21195-SDW-LDW
Our File No. 73-18-465

Dear Judge Wettre:

Our firm represents defendants, EF Corporation, Evans Delivery Corporation, Evans Delivery Corporation, Inc. and Jose Antonio Castillo-Pineda, in the above-captioned matter. We write to provide you with a brief case update in advance of our telephonic Status Conference, which is currently scheduled for Monday, October 19, 2020 at 2:00 p.m.

Under our current Pre-Trial Scheduling Order, factual discovery is to be completed by October 30, 2020. Although the parties have completed depositions, there is still some outstanding written discovery and medical records to be obtained. In addition, plaintiff still needs to appear for her independent medical examination (IME). Accordingly, we kindly request a **thirty (30) day extension** of the fact discovery end date and of the subsequent expert discovery deadlines. We have opposing counsel's consent to this request.

In addition, the parties have been trying to negotiate a settlement in the above matter. However, as we have been unable to come to an agreement on valuation, the parties would also like

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to request a telephonic or virtual **Settlement Conference** to take place before Your Honor in the near future.

We thank You for Your Honor's attention to and consideration of this matter.

Respectfully submitted,

COTTRELL SOLENSKY, P.A.



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